GHz Equipment Company, Inc. The Fiberless Optics™ Company

July 6, 1995

92-291

JUL 1 1 1505 FCC MAIL ROOM

Mr. William Caton, Secretary Federal Communications Commission 1919 M Street NW Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Secretary Caton:

The attached letters are being submitted to the Commission as Ex Parte documents, the content of which was previously submitted to the Commission. This submittal is intended specifically to meet the technical requirements of the regulations.

Sincerely,

Steven P. Seiter

President

SPS/dwa Enclosure

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GHz Equipment Company, Inc. 4703 S. Lakeshore Dr. Tempe, AZ 85282

June 6, 1995

Mr. Robert James E-Mail: rjames@fcc.gov

RE: Local Multipoint Distribution Service

CC Docket No. 92-297, Ex Parte Presentation

Dear Mr. James



As you know, GHz Equipment Co., Inc. ("GEC") has been an active participant in the search for adequate and appropriate spectrum for licensing the Local Multipoint Distribution Service ("LMDS"). In addition to our role in last year's negotiated rulemaking proceeding, we have been heavily involved in the development of state of the art millimeter wave technology. It is thus from a perspective of considerable experience that we wish to comment briefly upon several recent industry proposals for segmentation of the 28 GHz band.

Our principal concern is that the quantity of primary-use spectrum allocated for LMDS should not fall below 1,500 MHz. We continue to believe that a minimum of 750 MHz per licensee (assuming two licensees per service area) is essential to fulfill the promise of the varied millimeter wave applications we see flowing from new LMDS services, including competition to traditional cable with fiber (whose channel capacity is comparable to that of a 750 MHz LMDS system). Although compression technology, whenever it arrives, will increase channel capacity, the same technology will be available to the cable industry -- thus mooting the argument that compression will compensate for an initial shortfall in spectrum allocated for LMDS.

Indeed, in the event the Commission were persuaded that the allocation of less than 1,500 MHz of spectrum for LMDS was inevitable, given the conflicting forces at play in the LMDS proceeding, we would urge as an alternative that 2,000 MHz in the 40 GHz range be designated for LMDS use. It is well established in the research we have reviewed and in our own experience that the two bands are sufficiently comparable both in propagation characteristics and system cost for an LMDS-type service at 40 GHz to be a viable alternative.

Very truly yours,

Steven P. Seiter President

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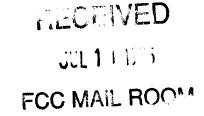
June 6, 1995

Mr. Thomas Tycz E-Mail: ttycz@fcc.gov

RE: Local Multipoint Distribution Service

CC Docket No. 92-297, Ex Parte Presentation

Dear Ms. Magnotti:



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Steven P. Seiter President

E-mail cc

Susan Magnotti Bob James

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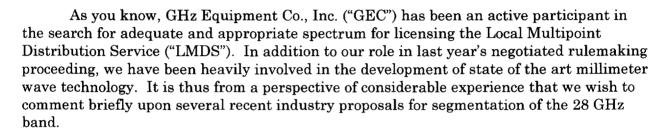
June 6, 1995

Ms. Susan Magnotti E-Mail: smagnott@fcc.gov

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